

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE

ESPERANZA DE LA CRUZ

DEBTOR

CASE NO. 11-03837-SEK

CHAPTER 13

**DEBTOR'S REPLY TO TRUSTEE'S UNFAVORABLE RECOMMENDATION
TO THE HONORABLE COURT:**

COMES NOW, ESPERANZA DE LA CRUZ debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follow:

1. The Chapter 13 Trustee filed an unfavorable recommendation dated June 28, 2011, (docket no. 12).
2. On July 8, 2011 the debtor send via *Upload Document Program (UDP)* a copy of the lawsuit and the application for employment of special counsel.
3. On July 8, 2011 the debtor filed an Amended Chapter 13 Plan, docket no. 13.
4. With this information the debtor responds to the Trustee's unfavorable recommendation.

WHEREFORE debtor respectfully prays that Trustee's unfavorable recommendation be denied.

I CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States

Postal Service copy of this motion to the following non CM/ECF participants and debtor, Esperanza De La Cruz, in the above captioned case.

RESPECFULLY SUBMITTED. In San Juan, Puerto Rico, this 8th day of July, 2011.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
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Chapter 13 Trustee
Alejandro Oliveras

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